

# **EXHIBIT A**

## **Compensation By Category – Second Monthly Compensation Period**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
B110 Case Administration	26.20	\$14,275.00
B130 Asset Disposition	8.50	\$4,899.00
B140 Relief from Stay/Adequate Protection Proceedings	3.80	\$2,522.00
B150 Meetings/Communications with Committee and/or Creditors	15.10	\$11,342.50
B160 Retention Applications (MJ)	4.10	\$1,772.00
B165 Retention Applications (Others)	8.70	\$4,939.50
B170 Fee Applications (MJ)	4.60	\$1,160.00
B175 Fee Applications (Others)	0.30	\$238.50
B190 Other Contested Matters (excluding assumption/rejection motions)	6.60	\$4,314.00
B220 Employee Benefits/Pensions	21.00	\$9,347.50
B310 Claims Administration and Objections	0.90	\$715.50
B320 Plan and Disclosure Statement	34.70	\$26,158.50
B430A Court Hearings: Attendance and Preparation	4.70	\$3,435.00
<b>Totals</b>	<b>139.50</b>	<b>\$85,234.50</b>

**Timekeeper Summary – Second Monthly Compensation Period**

<b>Timekeeper</b>	<b>Position</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Eric J. Monzo	Member of the Delaware Bar since 2008; Partner in Bankruptcy Department since 2014	\$795.00	25.50	\$9,817.50
Brya M. Keilson	Member of the Delaware Bar since 2005; Partner in Bankruptcy Department since 2019	\$750.00	27.50	\$20,625.00
Tara C. Pakrouh	Member of the Delaware Bar since 2015; Associate in Bankruptcy Department since 2023	\$660.00	3.40	\$2,244.00
Brian M. Ellis	Member of the Delaware Bar since 2005; Partner in the Real Estate and Tax, Estates and Business Transactions Departments since 2005	\$500.00	6.30	\$3,150.00
Siena B. Cerra	Member of the Pennsylvania Bar since 2023; Associate in Bankruptcy Department since 2023	\$385.00	25.50	\$9,817.50
Christopher M. Donnelly	Member of the Delaware Bar since 2023; Associate in Bankruptcy Department since 2023	\$385.00	2.10	\$808.50
Stephanie A. Lisko	Paralegal in Bankruptcy Department since 2020	\$350.00	14.30	\$5,005.00
Douglas J. Depta	Paralegal in Bankruptcy Department since 2020	\$350.00	6.50	\$2,275.00
Jessica K. Farenski	Case Manager	\$125.00	2.30	\$287.50
<b>Totals</b>			<b>139.50</b>	<b>\$85,234.50</b>
<b>Blended Rate \$611.00</b>				

# Morris James<sub>LLP</sub>

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Federal Tax I.D. 51-0023480

Lordstown Motors Corp. Official Committee of Equity Security  
Holders

December 7, 2023  
Invoice 598043

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Matter Name: Lordstown Motor Corp., et al.  
Matter Number: 142570-0001  
Attorney: Eric J. Monzo

## For Professional Services through October 31, 2023

<b>Fees</b>	<b>\$85,234.50</b>
<b>Disbursements</b>	<b>\$1,256.25</b>
<b>Total Charges</b>	<b>\$86,490.75</b>

## Fee Recap

		<b>Hours</b>	<b>Rate/Hours</b>	<b>Amount</b>
Brian M. Ellis	Partner	6.30	500.00	3,150.00
Brya M. Keilson	Partner	27.50	750.00	20,625.00
Eric J. Monzo	Partner	51.60	795.00	41,022.00
Siena B. Cerra	Associate	25.50	385.00	9,817.50
Christopher M. Donnelly	Associate	2.10	385.00	808.50
Tara C. Pakrouh	Associate	3.40	660.00	2,244.00
Douglas J. Depta	Paralegal	6.50	350.00	2,275.00
Stephanie A. Lisko	Paralegal	14.30	350.00	5,005.00
Jessica K. Farenski	Case Manager	2.30	125.00	287.50
<b>Totals</b>		<b>139.50</b>		<b>85,234.50</b>

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**Services by Task Code**

		<b>Hours</b>	<b>Amount</b>
B110	Case Administration	26.20	14,275.00
B130	Asset Disposition	8.50	4,899.00
B140	Relief from Stay/Adequate Protection Proceedings	3.80	2,522.00
B150	Meetings/Communications with Committee and/or Creditors	15.10	11,342.50
B160	Retention Applications (MJ)	4.10	1,772.00
B165	Retention Applications (Others)	8.70	4,939.50
B170	Fee Applications (MJ)	4.60	1,160.00
B175	Fee Applications (Others)	0.30	238.50
B190	Other Contested Matters (excluding assumption/rejection motions)	6.60	4,314.00
B220	Employee Benefits/Pensions	21.30	9,463.00
B310	Claims Administration and Objections	0.90	715.50
B320	Plan and Disclosure Statement	34.70	26,158.50
B430A	Court Hearings: Attendance and Preparation	4.70	3,435.00
<b>Totals</b>		<b>139.50</b>	<b>\$85,234.50</b>

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**Fees**

<b>Date</b>	<b>Atty</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
<b>B110 Case Administration</b>					
10/02/23	SAL	Review relevant pleadings filed, update critical dates, and update case calendar and folder.	0.40	350.00	140.00
10/02/23	SAL	Emails with B. Keilson re COC re securities trading motion.	0.20	350.00	70.00
10/02/23	EJM	Review analysis re corporate issues.	0.80	795.00	636.00
10/02/23	CMD	Prepare for and call with R. Basch re claim (.5); emails to and from E. Monzo and B. Keilson re same (.3).	0.80	385.00	308.00
10/02/23	CMD	Call with L. Williams re claim (.2); emails to and from E. Monzo and B. Keilson re summary and response (.4).	0.60	385.00	231.00
10/03/23	SAL	Review relevant pleadings filed, update critical dates, and update case calendar and folder.	0.20	350.00	70.00
10/03/23	SAL	Review agenda for October 5 hearing, register appearances and update case calendar and folder.	0.30	350.00	105.00
10/03/23	EJM	Review agenda for hearing agenda and witness and exhibit list.	0.50	795.00	397.50
10/03/23	EJM	Review SEC motion to extend time.	0.50	795.00	397.50
10/03/23	CMD	Draft internal communication re case status.	0.60	385.00	231.00
10/05/23	SAL	Review relevant pleadings filed, update critical dates, and update case calendar and folder.	0.20	350.00	70.00
10/05/23	SAL	Review amended agenda for October 5 hearing and	0.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
		update case calendar and folder.			
10/05/23	DJD	Email transcriber requesting Oct 5 transcript.	0.10	350.00	35.00
10/05/23	DJD	Review Oct 5 hearing transcript, circulate, and update case folder.	0.20	350.00	70.00
10/06/23	SAL	Review relevant pleadings filed and update case folder.	0.40	350.00	140.00
10/09/23	SAL	Review relevant pleadings filed, update critical dates, and update case calendar and folder.	0.30	350.00	105.00
10/11/23	EJM	Review agenda rescheduling hearing.	0.10	795.00	79.50
10/11/23	SAL	Emails with E. Monzo and co-counsel re critical dates calendar.	0.20	350.00	70.00
10/11/23	SAL	Review relevant pleadings filed, update critical dates, and update case calendar and folder.	0.20	350.00	70.00
10/12/23	SAL	Review relevant pleadings filed and update case folder.	0.20	350.00	70.00
10/13/23	EJM	Review agenda for hearing.	0.10	795.00	79.50
10/13/23	SAL	Emails with co-counsel re October 18 hearing and appearances.	0.30	350.00	105.00
10/14/23	EJM	Emails with debtors' counsel re agenda and matters scheduled for upcoming hearing.	0.30	795.00	238.50
10/16/23	SAL	Review agenda for October 18 hearing, register appearances for MJ, BR and M3, emails circulating same, and update case calendar and folder.	0.60	350.00	210.00
10/16/23	EJM	Review agenda for hearing.	0.20	795.00	159.00
10/16/23	SAL	Review relevant pleadings filed and update case folder.	0.20	350.00	70.00
10/16/23	EJM	Review amended agenda for hearing.	0.20	795.00	159.00
10/16/23	BMK	Emails with S. Lisko and E. Monzo regarding upcoming hearing and review updates.	0.70	750.00	525.00
10/17/23	SAL	Review amended agenda for October 18 hearing and update case calendar and folder.	0.10	350.00	35.00
10/17/23	SAL	Emails with co-counsel re October 18 hearing and appearance registrations.	0.30	350.00	105.00
10/17/23	SAL	Emails with T. Pakrouh, register appearance for October 18 hearing and update case calendar and folder.	0.20	350.00	70.00
10/17/23	TCP	Confer with MJ team re covering hearing (.5); emails with same re same (.2).	0.70	660.00	462.00
10/18/23	SAL	Review relevant pleadings filed, update critical dates and update case calendar and folder.	0.30	350.00	105.00
10/19/23	DJD	Email transcriber re Oct 18 transcript.	0.10	350.00	35.00
10/19/23	SAL	Emails with B. Keilson re hearing summary and update case folder.	0.10	350.00	35.00
10/20/23	DJD	Review relevant pleadings, update case folder, and update calendar.	0.40	350.00	140.00
10/20/23	DJD	Review Oct 18 hearing transcript, circulate, and update case folder.	0.20	350.00	70.00
10/20/23	BMK	Emails with professionals regarding updates and review relevant deck.	0.90	750.00	675.00
10/23/23	SAL	Review relevant pleadings filed, update critical date and update case calendar and folder.	0.30	350.00	105.00
10/23/23	EJM	Review Order re omnibus hearing.	0.10	795.00	79.50
10/23/23	EJM	Review notice of hearing.	0.10	795.00	79.50
10/23/23	SAL	Review agenda for October 25 hearing, emails to co-counsel re appearances, register appearances, and update case calendar and folder.	0.50	350.00	175.00

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Date	Atty	Description	Hours	Rate	Amount
10/23/23	BMK	Emails with S. Cerra and co-counsel regarding open issues and analysis and review relevant documents.	1.10	750.00	825.00
10/23/23	BMK	Emails with S. Cerra regarding open questions regarding relevant analysis.	0.40	750.00	300.00
10/24/23	SAL	Emails with co-counsel and Reliable circulating transcripts and update case folders.	0.30	350.00	105.00
10/24/23	SBC	Review employee agreements and prepare corresponding organizational chart.	3.00	385.00	1,155.00
10/24/23	SAL	Review relevant pleadings filed, update critical dates, and update case calendar and folder.	0.30	350.00	105.00
10/24/23	BMK	Emails and calls with co-counsel and S. Cerra regarding analysis of open issues and relevant case law (.9); review case law (.7).	1.60	750.00	1,200.00
10/25/23	SAL	Review relevant pleadings filed and update case folder.	0.10	350.00	35.00
10/25/23	BMK	Emails and calls with S. Cerra regarding open issues on analysis of bonuses and severance (.9); review relevant case law (.8); emails with co-counsel regarding same (.4).	2.10	750.00	1,575.00
10/26/23	SAL	Emails with co-counsel and Reliable re October 25 hearing transcript.	0.20	350.00	70.00
10/27/23	EJM	Review notice of agenda for hearing.	0.20	795.00	159.00
10/30/23	SAL	Review agenda for October 31 hearing, register appearances, and update case calendar and folder.	0.30	350.00	105.00
10/30/23	BMK	Emails with co-counsel, committee member and KCC regarding service questions.	0.60	750.00	450.00
10/30/23	SAL	Review relevant pleadings filed, update critical dates, and update case calendar and folder.	0.30	350.00	105.00
10/30/23	SAL	Email to co-counsel re October 31 hearing appearances.	0.10	350.00	35.00
10/30/23	EJM	Review agenda for hearing.	0.20	795.00	159.00
10/31/23	SAL	Review amended and second amended agenda for October 31 hearing and other relevant pleadings filed and update case calendar and folder.	0.30	350.00	105.00
10/31/23	SAL	Emails with S. Cerra re docket notifications and set up same.	0.10	350.00	35.00
10/31/23	SAL	Emails with co-counsel re PHV motions and annual fee.	0.10	350.00	35.00
10/31/23	SBC	Review intervention stipulation.	0.50	385.00	192.50
10/31/23	EJM	Emails internally re joinders and review draft of same.	0.60	795.00	477.00

**Task Code Subtotal****26.20****14,275.00****B130 Asset Disposition**

10/01/23	EJM	Emails re sale related issues and update.	0.40	795.00	318.00
10/03/23	BME	Legal research re stockholders, securities and asset sales.	2.20	500.00	1,100.00
10/05/23	BME	Legal research and voting rights.	2.60	500.00	1,300.00
10/12/23	EJM	Review US objection to sale.	0.90	795.00	715.50
10/16/23	BME	Preparation for call; research re: case law; call to discuss with White & Case attorneys.	1.50	500.00	750.00
10/18/23	EJM	Review form of sale Order.	0.90	795.00	715.50

**Task Code Subtotal****8.50****4,899.00****B140 Relief from Stay/Adequate Protection Proceedings**

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Date	Atty	Description	Hours	Rate	Amount
10/11/23	EJM	Emails with co-counsel re motion to defraud and joinder; internal communications for filings.	0.60	795.00	477.00
10/11/23	EJM	Review objection to shareholder motion.	0.50	795.00	397.50
10/11/23	EJM	Review of draft joinder in support of opposition to motion to defraud.	0.50	795.00	397.50
10/11/23	SAL	Emails with E. Monzo and co-counsel re joinder to objection to Singh motion for relief.	0.20	350.00	70.00
10/11/23	SAL	Review and update joinder to objection to Singh motion for relief and draft COS.	0.30	350.00	105.00
10/11/23	SAL	Finalize, file, circulate, and serve joinder to objection to Singh motion for relief.	0.50	350.00	175.00
10/11/23	BMK	Emails with S. Lisko, E. Monzo and co-counsel regarding draft joinder to Singh motion (.6); review draft (.6).	1.20	750.00	900.00
<b>Task Code Subtotal</b>			<b>3.80</b>		<b>2,522.00</b>
<b>B150 Meetings/Communications with Committee and/or Creditors</b>					
10/02/23	EJM	Address equity holder inquiry re proof of claim deadline and correspond with C. Donnelly.	0.20	795.00	159.00
10/03/23	EJM	Discussion with equity holders re proofs of claim.	0.40	795.00	318.00
10/03/23	EJM	Field calls of equity holders and inquiries.	0.20	795.00	159.00
10/04/23	EJM	Review Order re trading and emails with committee members.	0.30	795.00	238.50
10/05/23	EJM	Emails with co-counsel and B. Keilson re case update.	0.20	795.00	159.00
10/05/23	EJM	Review agenda for committee call.	0.20	795.00	159.00
10/06/23	BMK	Attend committee call.	0.50	750.00	375.00
10/06/23	BMK	Emails with co-counsel and committee regarding updates.	0.40	750.00	300.00
10/06/23	EJM	Attend weekly committee meeting.	1.00	795.00	795.00
10/13/23	EJM	Attend weekly committee call.	0.50	795.00	397.50
10/16/23	BMK	Emails with co-counsel and committee regarding updates and draft Plan (.3); review draft (.8).	1.10	750.00	825.00
10/18/23	EJM	Emails with committee re update on sale.	0.30	795.00	238.50
10/18/23	BMK	Emails with co-counsel and committee regarding updates and hearing.	0.50	750.00	375.00
10/19/23	BMK	Emails with co-counsel and committee regarding updates.	0.30	750.00	225.00
10/20/23	BMK	Attend committee call.	0.60	750.00	450.00
10/23/23	BMK	Emails with co-counsel and committee regarding updates.	0.40	750.00	300.00
10/26/23	EJM	Review analysis and financial information and contracts re request for executive compensation.	2.60	795.00	2,067.00
10/26/23	EJM	Discussion with co-counsel and financial professionals re retention and employee request; discussion with S. Cerra.	0.60	795.00	477.00
10/26/23	EJM	Review agenda for committee discussion.	0.30	795.00	238.50
10/26/23	BMK	Emails with co-counsel and committee regarding upcoming call and agenda.	0.30	750.00	225.00
10/27/23	BMK	Attend committee call.	0.80	750.00	600.00
10/27/23	SBC	Attend Committee meeting.	1.00	385.00	385.00
10/27/23	EJM	Reply following committee call on action items.	0.50	795.00	397.50
10/30/23	EJM	Emails with committee members and co-counsel re inquiry from equity holder; review supporting documents.	1.20	795.00	954.00
10/30/23	BMK	Emails with co-counsel and committee regarding updates and review relevant documents.	0.70	750.00	525.00

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Date	Atty	Description Task Code Subtotal	Hours 15.10	Rate	Amount 11,342.50
<b>B160 Retention Applications (MJ)</b>					
10/12/23	SAL	Draft and circulate CNO re retention application.	0.20	350.00	70.00
10/14/23	SAL	Finalize, file, and circulate CNO re Morris James retention application, including submission of proposed order.	0.30	350.00	105.00
10/16/23	DJD	Review email from UST re parties of interest, check conflicts ran, and email J. Hoffman re additional names to run conflict check.	1.40	350.00	490.00
10/17/23	DJD	Draft supplemental declaration and email E. Monzo.	0.40	350.00	140.00
10/17/23	JKS	Correspondence internally re supplemental names for conflicts for retention application.	0.30	125.00	37.50
10/18/23	EJM	Review of supplemental declaration re retention and inquiry of US Trustee.	0.10	795.00	79.50
10/18/23	DJD	Update and file supplemental declaration, email counsel for service, arrange mail service, and update case folder.	0.50	350.00	175.00
10/18/23	BMK	Emails with E. Monzo and D. Depta regarding supplemental declaration and filing same (.6); review draft (.3).	0.90	750.00	675.00
<b>Task Code Subtotal</b>			<b>4.10</b>		<b>1,772.00</b>
<b>B165 Retention Applications (Others)</b>					
10/02/23	EJM	Review certification of counsel and form of order re Winston retention.	0.10	795.00	79.50
10/03/23	EJM	Review RLF retention motion and US Trustee objection.	1.00	795.00	795.00
10/12/23	EJM	Emails internally and review draft CNOs re retention.	0.20	795.00	159.00
10/12/23	DJD	Draft BR chairperson declaration and circulate for review.	0.40	350.00	140.00
10/12/23	DJD	Compile and emails with S. Lisko re retention orders.	0.20	350.00	70.00
10/12/23	SAL	Emails with E. Monzo, B. Keilson and co-counsel re CNOs for retention applications and committee declaration.	0.30	350.00	105.00
10/12/23	SAL	Draft and circulate CNOs re BR and M3 retention applications.	0.40	350.00	140.00
10/12/23	EJM	Emails with co-counsel re retention and finalizing concerns of UST.	0.20	795.00	159.00
10/12/23	EJM	Emails re co-counsel retention and supporting documentation.	0.40	795.00	318.00
10/12/23	SAL	Draft COS and prepare service list re Sole declaration in support of BR retention application.	0.20	350.00	70.00
10/12/23	SAL	Finalize, file, circulate, and serve Sole declaration in support of BR retention application.	0.70	350.00	245.00
10/12/23	BMK	Emails with co-counsel and S. Lisko regarding supplemental declaration for BR and review same.	0.80	750.00	600.00
10/13/23	SAL	Revise CNO to COC re BR retention application and circulate to B. Keilson.	0.30	350.00	105.00
10/13/23	BMK	Emails with S. Lisko regarding pending retention applications and draft COC and review same.	0.80	750.00	600.00
10/14/23	SAL	Emails with E. Monzo and B. Keilson re status of CNOs for retention applications.	0.20	350.00	70.00
10/14/23	SAL	Finalize, file, and circulate COC re Brown Rudnick retention application, including submission of proposed	0.30	350.00	105.00



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Date	Atty	Description	Hours	Rate	Amount
10/14/23	SAL	order. Finalize, file, and circulate CNO re M3 retention application, including submission of proposed order.	0.30	350.00	105.00
10/14/23	SAL	Finalize, file, circulate and serve A&M retention application.	0.70	350.00	245.00
10/14/23	BMK	Emails with S. Lisko regarding pending retention applications and draft CNOs and review drafts.	0.80	750.00	600.00
10/16/23	SAL	Review and circulate retention orders to co-counsel and update case folder.	0.20	350.00	70.00
10/16/23	EJM	Emails with US Trustee's office and B. Keilson re retention of equity committee professionals.	0.20	795.00	159.00
<b>Task Code Subtotal</b>			<b>8.70</b>		<b>4,939.50</b>
<b>B170 Fee Applications (MJ)</b>					
10/17/23	DJD	Begin drafting first monthly application.	0.50	350.00	175.00
10/18/23	DJD	Review Sept. invoice and email J. Farenski re updates.	1.00	350.00	350.00
10/18/23	JKS	Revise invoice for preparation of fee application and email accounting re updated invoice.	1.80	125.00	225.00
10/19/23	DJD	Continue drafting first monthly application.	1.00	350.00	350.00
10/20/23	JKS	Disbursement expense request re preparation of fee application.	0.20	125.00	25.00
10/20/23	DJD	Email with accounting and B. Keilson re estimated Oct fees.	0.10	350.00	35.00
<b>Task Code Subtotal</b>			<b>4.60</b>		<b>1,160.00</b>
<b>B175 Fee Applications (Others)</b>					
10/09/23	EJM	Review filings re professional applications and filings.	0.30	795.00	238.50
<b>Task Code Subtotal</b>			<b>0.30</b>		<b>238.50</b>
<b>B190 Other Contested Matters (excluding assumption/rejection motions)</b>					
10/02/23	SAL	Revise COC re securities trading motion and finalize additional exhibits.	0.40	350.00	140.00
10/02/23	SAL	File and circulate COC re securities trading motion, including submission of proposed order.	0.50	350.00	175.00
10/02/23	BMK	Emails with S. Lisko and E. Monzo regarding draft COC and revised order regarding trading and filing same (.7); review and edit drafts (.7).	1.40	750.00	1,050.00
10/03/23	EJM	Emails with counsel at Richards Layton and Finger re inquiry into status of Chambers comments on Federated motion.	0.20	795.00	159.00
10/04/23	SAL	Emails with B. Keilson re status of securities trading order.	0.10	350.00	35.00
10/04/23	EJM	Discussions and correspondence with co-counsel, B. Keilson and Richards Layton & Finger re federated motion and trading.	0.60	795.00	477.00
10/04/23	BMK	Emails with Debtors' counsel, co-counsel and E. Monzo regarding pending trading motion and hearing (.7); review entered order (.3).	1.00	750.00	750.00
10/04/23	SAL	Review and circulate entered securities trading order to co-counsel and update case folder.	0.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
10/26/23	TCP	Emails re committee intervention.	0.20	660.00	132.00
10/31/23	SAL	Emails with T. Pakrouh re Foxconn stipulation and update same.	0.40	350.00	140.00
10/31/23	TCP	Emails with MJ team re intervention Stipulation (.2); draft same (.4).	0.60	660.00	396.00
10/31/23	BMK	Emails with T. Pakrouh and E. Monzo and co-counsel regarding stipulation to allow intervention in adversary proceeding (.6); review and edit draft (.5).	1.10	750.00	825.00
<b>Task Code Subtotal</b>			<b>6.60</b>		<b>4,314.00</b>
<b>B220 Employee Benefits/Pensions</b>					
10/20/23	CMD	Review correspondence from B. Keilson re research severance claims and 502(b).	0.10	385.00	38.50
10/23/23	SBC	Legal research re severance claim caps.	3.30	385.00	1,270.50
10/23/23	SBC	Review employee severance agreements.	0.50	385.00	192.50
10/24/23	SBC	Research re bankruptcy code severance payment caps.	0.50	385.00	192.50
10/24/23	SBC	Discuss employment agreements with B. Keilson and K. Brown.	0.30	385.00	115.50
10/25/23	SBC	Legal research re severance and bonus provision caps.	3.00	385.00	1,155.00
10/25/23	SBC	Conduct legal research and analysis of bonus component in executive agreements and draft memorandum for co-counsel.	4.00	385.00	1,540.00
10/25/23	EJM	Emails with B. Keilson and S. Cerra re employee related request for compensation (.4) and review memorandum relating to same (.6).	1.00	795.00	795.00
10/25/23	EJM	Review employee agreements and assess claims.	1.10	795.00	874.50
10/26/23	SBC	Discuss legal research and cap issue with B. Keilson and E. Monzo.	0.50	385.00	192.50
10/26/23	SBC	Review employment agreements and update corresponding organizational chart.	2.00	385.00	770.00
10/26/23	SBC	Attend call with M3 team re Executive Employment Agreements.	1.00	385.00	385.00
10/26/23	SBC	Discuss case law re severance payments with E. Monzo.	0.40	385.00	154.00
10/26/23	BMK	Emails and calls with co-counsel, E. Monzo and S. Cerra regarding analysis of claims and severance.	1.10	750.00	825.00
10/27/23	SBC	Correspond with B. Keilson re Debtors employment agreement proposal.	0.30	385.00	115.50
10/27/23	SBC	Legal research re severance cap calculation.	1.00	385.00	385.00
10/31/23	SBC	Review employment agreements and update corresponding organizational chart.	1.20	385.00	462.00
<b>Task Code Subtotal</b>			<b>21.30</b>		<b>9,463.00</b>
<b>B310 Claims Administration and Objections</b>					
10/11/23	EJM	Emails re update on claims issues with co-counsel and debtors' counsel.	0.30	795.00	238.50
10/20/23	EJM	Emails with B. Keilson re claim inquiry on employee claims.	0.60	795.00	477.00
<b>Task Code Subtotal</b>			<b>0.90</b>		<b>715.50</b>

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Date	Atty	Description	Hours	Rate	Amount
<b>B320 Plan and Disclosure Statement</b>					
10/06/23	EJM	Review disclosure statement objections.	1.10	795.00	874.50
10/10/23	EJM	Review UST objection to disclosure statement and plan.	1.30	795.00	1,033.50
10/10/23	EJM	Recife plan and disclosure related issues re objection points.	1.80	795.00	1,431.00
10/16/23	EJM	Review updates plan documents.	2.30	795.00	1,828.50
10/16/23	EJM	Review plan related comments and emails with co-counsel and debtors.	2.10	795.00	1,669.50
10/22/23	EJM	Emails internally and with co-counsel re equity and liquidation.	0.70	795.00	556.50
10/22/23	EJM	Emails with client and with co-counsel re plan status.	0.60	795.00	477.00
10/22/23	BMK	Emails with co-counsel regarding amended Plan and DS (.5); review documents (1.2).	1.70	750.00	1,275.00
10/23/23	EJM	Review materials re plan and classes.	1.80	795.00	1,431.00
10/23/23	EJM	Email update with client re plan and disclosure statement hearing.	0.10	795.00	79.50
10/23/23	EJM	Review materials re plan and disclosure statement.	1.20	795.00	954.00
10/23/23	EJM	Update and review of plan issues.	2.20	795.00	1,749.00
10/24/23	EJM	Exchange emails with co-counsel re plan update.	0.40	795.00	318.00
10/24/23	EJM	Review amended disclosure statement and plan.	3.20	795.00	2,544.00
10/25/23	EJM	Review plan and positions relating to objections asserted at hearing.	2.10	795.00	1,669.50
10/27/23	EJM	Continued plan analysis and review.	2.00	795.00	1,590.00
10/30/23	EJM	Review amended plan and disclosure statement.	2.10	795.00	1,669.50
10/30/23	EJM	Review pending objections to plan and disclosure statement.	0.90	795.00	715.50
10/30/23	EJM	Review committee support letter.	0.30	795.00	238.50
10/30/23	SBC	Review relevant pleadings re disclosure statement.	3.00	385.00	1,155.00
10/30/23	BMK	Review amended disclosure statement.	1.00	750.00	750.00
10/30/23	BMK	Emails with co-counsel and Debtors' counsel regarding draft solicitation letter from equity committee and review same.	0.80	750.00	600.00
10/31/23	EJM	Attend hearing on approval of disclosure statement.	0.70	795.00	556.50
10/31/23	EJM	Emails and review drafts re opposition to plan and support letters.	0.40	795.00	318.00
10/31/23	BMK	Emails with Debtors' counsel and co-counsel regarding solicitation letter of official equity committee letter (.3); review draft (.6).	0.90	750.00	675.00
<b>Task Code Subtotal</b>			<b>34.70</b>		<b>26,158.50</b>
<b>B430A Court Hearings: Attendance and Preparation</b>					
10/05/23	EJM	Attend hearing re retention and other issues on agenda (resolved motion on trading) and intro of equity committee to Court.	1.30	795.00	1,033.50
10/18/23	TCP	Emails with B. Keilson re hearing coverage (.2); attend same (1.0); draft notes for same (.7).	1.90	660.00	1,254.00
10/25/23	EJM	Attend status conference.	0.50	795.00	397.50
10/25/23	BMK	Attend hearing.	0.50	750.00	375.00
10/31/23	BMK	Attend disclosure statement hearing.	0.50	750.00	375.00
<b>Task Code Subtotal</b>			<b>4.70</b>		<b>3,435.00</b>

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**Sub-Total Fees: 85,234.50**
**For Disbursements through October 31, 2023**

Disbursements		
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Date	Description	Amount
	Postage	20.10
	Reproduction	6.90
	Westlaw	521.69
10/05/23	Reliable Wilmington - Lordstown - Reliable 9.20.23 Service	48.32
10/05/23	Reliable Wilmington - Lordstown- Reliable Production – 9.27.23 Mail Service of Retention Applications	164.74
10/11/23	Pacer Research	19.70
10/11/23	Pacer Research	18.80
10/20/23	Reliable Wilmington - Lordstown - Reliable (Transcript) 10.5.23 Hearing Transcript	456.00
<b>Total Disbursements</b>		<b>1,256.25</b>

<b>Total Services and Disbursements this period</b>	<b>\$86,490.75</b>
<b>Balance Due</b>	<b>\$86,490.75</b>

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